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8 *Attorneys for Defendant*
CITY OF HENDERSON

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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12
13 KELLY WOODBURN, THOMAS
WOODBURN, and JOSHUA
14 RODRIGUEZ individually and on behalf
of all others similarly situated,

15 Plaintiffs,
16 vs.

17 CITY OF HENDERSON; DOES I through
V, inclusive; and ROE CORPORATIONS
18 I through V, inclusive,

19 Defendants.

20 Case No. 2:19-cv-01488-JAD-VCF

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22 **STIPULATION AND ORDER TO EXTEND
THE DEADLINE FOR DEFENDANT TO
ANSWER THE SECOND AMENDED
COMPLAINT**

23
24 **[FIRST REQUEST]**

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26 Plaintiffs KELLY WOODBURN, THOMAS WOODBURN, and JOSHUA RODRIGUEZ
("Plaintiffs"), and Defendant CITY OF HENDERSON ("Defendant"), by and through their respective
counsel of record, do hereby stipulate and request an order extending the deadline for Defendant to
file an Answer to Plaintiffs' Second Amended Complaint [ECF No. 57] by four (4) weeks from the
current deadline of December 13, 2021, up to and including **January 10, 2022**. This is the first request
for an extension of time to Answer to the Second Amended Complaint.

1 The requested extension is necessary because Defendant's counsel needs additional time to
2 prepare its Answer to the Second Amended Complaint and Affirmative Defenses and various
3 commitments have prevented them from meeting the current deadline. Additionally, Defendant's
4 counsel has planned time out of the office in coming weeks for the holidays. Accordingly, the
5 additional time requested will allow Defendant's counsel to prepare its Answer to the Second
6 Amended Complaint and for its client to have sufficient time to review the same in advance of the
7 filing.

8 The instant request is made in good faith and not for the purpose of delay.

9 Dated: December 10, 2021

Dated: December 10, 2021

10 CLAGGETT & SYKES LAW FIRM

LITTLER MENDELSON, P.C.

12 By: /s/ Joseph N. Mott

JOSEPH N. MOTT, ESQ.

14 Attorneys for Plaintiffs

KELLY WOODBURN, THOMAS
WOODBURN, and JOSHUA
RODRIGUEZ

12 By: /s/ Ethan D. Thomas

MONTGOMERY Y. PAEK, ESQ.
ETHAN D. THOMAS, ESQ.
EMIL S. KIM, ESQ.

14 Attorneys for Defendant
15 CITY OF HENDERSON

17 **IT IS SO ORDERED.**

18 Dated: December 10, 2021.



21 UNITED STATES MAGISTRATE JUDGE